

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK
BROOKLYN DIVISION

IN RE

CHAPTER 13

STEVE N MURRAY A/K/A STEVE NATHAN
MURRAY A/K/A STEVE MURRAY

CASE NO. 1-21-40002-jmm

JUDGE: Jil Mazer-Marino

DEBTOR

OBJECTION TO CONFIRMATION

Robert W. Griswold, Esq., an attorney admitted to practice in this Court, affirms the following under penalty of perjury:

1. I am an associate with LOGS Legal Group LLP, attorney for Wells Fargo Bank, N.A., (“Secured Creditor”) and am familiar with the facts and circumstances surrounding this matter.

2. Secured Creditor holds a mortgage on the Debtor’s real property known as 1468 Jefferson Ave, Brooklyn, NY 11237 (the “Property”).

3. Wells Fargo Bank, N.A. has filed a Proof of Claim, reflected on the claim register as claim number 1-1, for pre-petition mortgage arrears in the amount of \$55,163.74. Debtor’s proposed Chapter 13 Plan makes no provision for full payment of the mortgage arrears in violation of Bankruptcy Code Section 1325(a)(5)(B)(ii).

WHEREFORE, the undersigned respectfully requests the Debtor to amend their Chapter 13 Plan to reflect the proper mortgage arrears as specified earlier or, in the absence of an amendment to the Plan, the undersigned respectfully requests an Order of this Court denying

confirmation of Chapter 13 Plan pursuant to Bankruptcy Code Section 1325 and such other and further relief as may be just and proper.

Dated: February 12, 2021
Merrick, NY

/s/ Robert W. Griswold
Robert W. Griswold
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CERTIFICATE OF SERVICE

The undersigned certifies that on February 12, 2021, a copy of Objection to Confirmation was caused to be mailed by ordinary U.S. Mail, postage prepaid, and/or electronically upon the following:

Debtor
Steve N Murray a/k/a Steve Nathan Murray a/k/a Steve Murray
1468 Jefferson Ave
Brooklyn, NY 11237

Attorney for Debtor
Clover M. Barrett, Clover M. Barrett, P.C.
cbarrettpc@aol.com

Trustee
Michael J. Macco
ecf@maccolaw.com

Dated: February 12, 2021
Merrick, NY

/s/ Robert W. Griswold
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